

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JAYLEEN HERRERA,

Plaintiff,

v.

BOSTON MARKET CORPORATION,

Defendant.

**NOTICE OF MOTION
ON CONSENT TO
WITHDRAW AS
COUNSEL**

Docket No. 1:20-cv-04284

PLEASE TAKE NOTICE that upon the accompanying Declaration of GREGORY B. REILLY of Bond, Schoeneck & King, PLLC, dated August 17, 2023 and upon all prior papers and proceedings herein, the undersigned will move this Court before the Honorable Magistrate Judge Peggy Kuo at the Federal Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11201, at the date and time as directed by the Court for an Order:

- (a) Pursuant to Rule 1.4 of the Local Rules of the U.S. District Court for the Eastern District of New York, relieving Bond, Schoeneck & King, PLLC as counsel for Defendant, BOSTON MARKET CORPORATION, in the above-captioned proceeding;
- (b) Staying this matter for sixty (60) days, or such other time that pleases the Court, to permit and allow this Defendant the opportunity to secure and retain new counsel; and
- (c) For all such other relief as this Court may deem just, equitable, and proper.

Dated: New York, New York
August 17, 2023

BOND, SCHOENECK & KING, PLLC

By: /s/ Gregory B. Reilly
Gregory B. Reilly, Esq.
Attorneys for Defendant
600 Third Avenue, 22nd Floor
New York, NY 10016-1915
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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2023, I caused the foregoing Notice of Motion on Consent to Withdraw as Counsel in the matter of *Jayleen Herrera v. Boston Market Corporation*; Docket No. 1:20-cv-04284 to be served on the following persons on this date by USPS Certified Mail Return Receipt Requested :

Mr. Jignesh "Jay" Pandya
Rohan Group of Companies
14103 Denver West Parkway
Golden, Colorado 80401

Ms. Frances Allen, CEO
Boston Market Corporation
14103 Denver West Parkway
Golden, Colorado 80401

/s/ Gregory B. Reilly
Gregory B. Reilly